

Federal Trade Commission/Office of the Secretary Room H-135 (Annex W)
Re. Business Opportunity Rule R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Sir or Madam:

I am writing this letter because I am concerned about a proposed Business Opportunity Rule R511993. I believe in its present form, it could prevent me from continuing as a Cookie Lee Consultant. I understand that the FTC's responsibility is to protect the public from 'unfair and deceptive acts or practices,' but some of the sections of the proposed rule will make it very difficult if not impossible for me to see Cookie Lee Jewelry products.

One of the most concerning sections is the proposed rule that a person should wait seven days to enroll as a new consultant. Our initial business start-up costs are between \$300 and \$600 and that is a very reasonable amount to start one's own business. People purchase TV's, cars, and other items that cost far more than that and they do not have to wait 7 days to take ownership of those large ticket items. This proposed waiting period gives the impression that there might be something wrong with our product. This would hugely impact my record-keeping processes as well and would also cause people to wait unnecessarily to get started right away making extra money for their families.

I have been selling our jewelry for almost seven years and would like you to understand that this has made my family much more financially sound. I am able to contribute to our family income as I would never have been able to in corporate America. I have grown as a person, wife, mother and leader and it is all because I was given the opportunity to have my very own business and learn how to be successful. My family depends on this income and your proposal would negatively affect that income.

The proposed rule also calls for the release of any information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Cookie Lee was found guilty of something. Otherwise, Cookie Lee and I are put at an unfair advantage even though neither of us has done anything wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchase. I find this ludicrous, because if I am in a department store I do not request the personal information on the last 10 people that were in line, nor do I ask for the 10 people closest to the store who last purchased. How can this possibly be considered fair for the self-employed direct seller? This could be detrimental to anyone involved in supplying this information considering the rampant identity theft that is taking place in our country today. Not only that, but you would be interfering with my relationship to my customer and that could put me out of business.

I appreciate the work of the FTC to protect consumers, but feel that this proposed rule has many unintended consequences. There has to be alternatives available that would protect the consumer as well as the direct selling consultants.

Thank you for your time in considering the comments above.

Sincerely,

Fern Flaim
Unit Manager for Cookie Lee Jewelry